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February 24, 2023

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Vera M. Scanlon, U.S.M.J.
225 Cadman Plaza East, Room 1214 South
Brooklyn, NY 11201-1804

Re: Taveras v. Value Service & Repair Corp., et al.
Case No.: 22-cv-03416 (HG)(VMS)

Dear Judge Scanlon:

I represent the Defendants in the above-referenced matter.

Defendants respectfully request that their time to respond to the complaint be extended from March 3, 2023 until three (3) weeks after the Court so orders the proposed Stipulated Protective Order (ECF Doc. No. 28). The reason for this request is that the parties are still attempting to resolve this case and once the Court so orders the proposed Stipulated Protective Order, Defendants will produce tax returns and bank records to Plaintiff to consider for purposes of settlement. This is Defendants' second request for an extension of time to respond to the Complaint. The only date that may be affected is the scheduled initial conference on March 28.

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/s/ Jamie S. Felsen